

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re ALUMINUM WAREHOUSING ANTITRUST LITIGATION	:	No. 13 MD 2481 (KBF)
	:	<u>CLASS ACTION</u>
This Document Relates To:	:	JOINT [PROPOSED] SCHEDULING ORDER
<i>In re Aluminum Warehousing Antitrust Litigation</i> (Direct Purchaser Plaintiffs), Case No. 1:14-cv-03116-KBF (S.D.N.Y.); <i>Agfa</i> <i>Corporation and Agfa Graphics, N.V. v. The Goldman Sachs Group, Inc.</i> , Case No. 1:14-cv- 0211-KBF (S.D.N.Y.); <i>Mag Instrument, Inc. v. The Goldman Sachs Group, Inc.</i> , Case No. 1:14-cv-00217-KBF (S.D.N.Y.); <i>Eastman Kodak Company v. The Goldman Sachs Group, Inc.</i> , Case No. 1:14-cv-06849-KBF (S.D.N.Y.).	:	
	:	
	X	

KATHERINE B. FORREST, District Judge:

It is hereby ORDERED that the schedule governing this multidistrict litigation shall be as follows:

1. The Direct Purchaser Plaintiffs shall file the Third Amended Complaint (“TAC”) under seal by **April 9, 2015**.
2. Plaintiffs Agfa Corporation, Agfa Graphics, N.V., Mag Instrument, Inc., and Eastman Kodak Company (collectively, “Individual Plaintiffs”) shall file the Joint Amended Complaint (“JAC”) under seal by **April 9, 2015**.
3. Rolling document productions shall commence or resume on or before **April 16, 2015**.
4. The parties shall exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) by **April 27, 2015**.
5. Defendants shall answer the TAC and JAC by **May 29, 2015**.
6. Fact discovery shall close on **May 13, 2016**.
 - (a) Document discovery shall be substantially completed by **February 12, 2016**.
 - (b) Fact depositions shall be completed by **May 13, 2016**.
7. Motions for class certification shall be briefed according to the following schedule:
 - (a) Opening motions: **June 13, 2016**.
 - (b) Oppositions: **August 12, 2016**.
 - (c) Replies: **October 11, 2016**.
8. A hearing on class certification, if any, shall occur on _____.
9. Expert discovery shall close on **March 3, 2017**.

(a) The parties shall produce any expert reports on which the party has an affirmative burden of proof by **December 7, 2016**.

(b) Any rebuttal reports shall be produced by **February 10, 2017**.

(c) Expert depositions shall be completed by **March 3, 2017**.

10. Motions for summary judgment may be brought on any issue at any time. Any such motions shall be brought on the first Monday of the month.

11. The last dates on which motions for summary judgment shall be briefed are as follows:

(a) Opening motions: **March 17, 2017**.

(b) Oppositions: **May 5, 2017**.

(c) Replies: **June 5, 2017**.

(d) Any party wishing to move to preclude any expert whose testimony is proffered in connection with a summary judgment motion must ensure that any *Daubert* motions are fully briefed by the date on which such summary judgment motion is fully submitted.

12. The Parties shall file a Joint Pretrial Order on **June 30, 2017**. See Individual Practices, Rule 3.A.

13. Trial in this matter shall begin on **July 17, 2017**.¹

IT IS SO ORDERED.

DATED: _____

THE HONORABLE KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE

¹ Individual Plaintiffs Agfa Corporation, Agfa Graphics, N.V., Mag Instrument, Inc., and Eastman Kodak Company reserve all their rights to remand under 28 U.S.C. §1407(a). *See also Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998).